## TENNESSEE AIR POLLUTION CONTROL BOARD DEPARTMENT OF ENVIRONMENT AND CONSERVATION NASHVILLE, TENNESSEE 37243-1531



### OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued:		Permit Number:
		458872
Date Expires: May 30, 2016		
Issued To:	Draft	Installation Address:
ST. JOSEPH CASKET COMPANY	4/12/06	502 Wilson Avenue St. Joseph
Installation Description:		Emission Source Reference No.
Manufacturing Facility Consisting of: 01 - Surface Coating Operation		50-0055

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

#### **General Conditions:**

1. The application that was utilized in the preparation of this permit was dated February 1, 2006 and signed by Joey Wayne Wilson, manager of the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions, and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and/or covenants.

(Continued on the next page)

-	TECHNICAL	SECRETARY	

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

CN-0827 (Rev. 9-92)

Section I: The following conditions shall apply to all sections of this permit unless otherwise noted.

- 2. The Permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The Permittee would be considered a major source because their "potential to emit" value(s) for a single hazardous air pollutant (HAP) was greater than 10 tons per year and for a combination of hazardous air pollutants (HAPs) was greater than 25 tons per year at the time of application. The Permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for a single HAP of 10 tons per year and for a combination of HAPs of 25 tons per year.
- 3. Any non compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability threshold(s) of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within fifteen (15) working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated, and details of the violation.
- 4. The Permittee is placed on notice that **Condition 5** of this permit contain limitation(s) that allow the Permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.
- 5. Emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.9 tons during any interval of 12 consecutive months including permitted sources and exempt-from-permitting sources. Emissions of any combination of HAPs shall not exceed 24.9 tons during any interval of 12 consecutive months including permitted sources and exempt-from-permitting sources.
  - This emission limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated **later, 2006**.
- 6. Visible emissions from this source shall not exceed twenty (20) percent opacity except for one (1) six-minute period per one (1) hour or more than twenty-four (24) minutes in any twenty-four (24) hour period. The emissions from this source shall be determined by EPA Method 9, as published in the <u>current</u> 40 CFR 60, Appendix A (6-minute average).
  - This condition is established pursuant to Rule 1200-3-5-.01(5) and -.03(6) of the Tennessee Air Pollution Control Regulations.
- 7. Reasonable precautions must be taken to prevent the generation of fugitive dust as these precautions are defined in Rule 1200-3-8-.01 in the Tennessee Air Pollution Control Regulations.
- 8. The operations controlled by the air pollution control device(s) shall not operate unless the control device is in operation. In the event a malfunction/failure of the control device occurs, the operation of the process(es) controlled by this control device shall be regulated by Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.

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9. Should compliance for the pollutants with emission limitations placed on this permit be required, the emissions measuring test methods and procedures are the following:

#### Pollutant or Parameter

#### Testing Methodology

Particulate Matter

EPA Method 5, as published in the current 40 CFR 60, Appendix A

- 10. Routine maintenance, as required to maintain specified emission limits for filter pads and any other emission control device, shall be performed on the air pollution control devices. Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five (5) years.
- 11. This permit supersedes any previous permits for these sources.
- 12. The Permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit's expiration date pursuant to Rule 1200-3-9-.02(3).
- 13. The issuance of this permit does not exempt the Permittee from any requirements of the Environmental Protection Agency pertaining to emissions from the operation of this source.
- 14. Excess emissions shall be addressed as specified in Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.
- 15. All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required.
- 16. Purchase orders and/or invoices for all **VOC** and **HAP** containing materials along with current material safety data sheets (MSDS) must be maintained and kept available for inspection by the Technical Secretary or a Division representative. These records must explicitly list the **VOC** content by weight for all **VOC** containing materials. If MSDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained for a period of not less than five (5) years.
- 17. A written report stating the compliance status of this facility with permit Conditions 5 and 18 shall be submitted by March 31 of every year starting in 2007. This report shall cover the preceding calendar year, and shall include the records required by Conditions 19 and 21. For example, the first report since the issuance of this permit shall cover the calendar year 2006 and will be due March 31, 2007.

This report shall be submitted to:

Columbia Environmental Field Office 2484 Park Plus Drive Columbia, TN 38401

Section II: Source Specific Conditions

50-0055-01 Surface Coating Operation: Spray Coating Metal Caskets. Spray Booths with Exhaust Filter Control.

- 18. Volatile organic compounds emitted from this source shall not exceed **99.0** tons during any interval of 12 consecutive months. **Condition 21** shall be used to indicate compliance of this condition.
  - This emission limitation is established pursuant to Rule 1200-3-9-.01(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated **later**, 2006.
- 19. Total particulate matter emitted from this source shall not exceed **0.02** grain per dry standard cubic foot (**12.3** pounds per hour). Compliance with this requirement shall be assured by routine replacement of filter pads and **Condition 6** compliance. Filter replacement logs must be kept which include the replacement date(s). These logs must be retained for a period of not less than five (**5**) years.
- 20. This source shall not operate without exhaust filters in place.

#### FORMS FOR RECORDKEEPING

- 21. Recordkeeping for **VOCs** and **HAPs** shall include the two (2) logs in this condition, which contain the following information:
  - (1) Emissions in tons of each Hazardous Air Pollutant,
  - (2) Emissions in tons of **VOCs** excluding exempt compounds as defined by 1200-3-18-.01(26), and
  - VOCs and HAPs discharged for all input materials used during any interval of 12 consecutive months. A log of information in the following formats or alternative formats approved by the Technical Secretary, in writing, must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. Records shall also be retained to verify the HAP content of each material. This may include MSDS, formulation data, or other documentation to establish the HAP content. All data shall be entered in the logs in a timely manner according to Condition 15. This log must be retained for a period of not less than five (5) years.

# MONTHLY LOG for Source 50-0055-01 Month Year Material Name Usage VOC VOC HAP 1 HAP 1 HAP 2 HAP 2 HAP 3 HAP 3 HAP 1 HAP 1 Total HAP

Material Name	Usage	VOC Content	VOC Emissions <sup>1</sup>	HAP 1 Content	HAP 1 Emissions <sup>1</sup>	HAP 2 Content	HAP 2 Emissions <sup>1</sup>	HAP 3 Content	HAP 3 Emissions <sup>1</sup>	HAP i Content	HAP i Emissions <sup>1</sup>	Total HAPs Emissions <sup>1</sup> (tn/mth)
	(lb/gal)	(lb/gal)	(tn/yr)	(lb/gal)	(tn/yr)	(lb/gal)	(tn/yr)	(lb/gal)	(tn/yr)	(lb/gal)	(tn/yr)	( C11/ (((C11)
TOTAL												

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(1) Emissions are the amount of VOCs or HAPs emitted to air. This log will be used to calculate air emissions.

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Draft
4/12/06

### YEARLY LOG for Source 50-0055-01

Month/Year	VOC Emissions	VOC Emissions <sup>3</sup>	HAP 1 Emissions	HAP 1 Emissions <sup>3</sup>	HAP 2 Emissions	HAP 2 Emissions <sup>3</sup>	HAP 3 Emissions	HAP 3 Emissions <sup>3</sup>	HAP i Emissions	HAP i Emissions <sup>3</sup>	Total HAP Emissions <sup>3</sup>
	(tn/12 mth)	(tn/12 mth)	(tn/mth)	(tn/12 mth)	(tn/mth)	(tn/12 mth)	(tn/mth)	(tn/12 mth)	(tn/mth)	(tn/12 mth)	(tn/12 mth)
1											
2											
3											
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15											

- (2) This log lists the individual month totals. The totals for 12-consecutive months on these logs must meet the requirements in **Conditions 5** and **18**.
- The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate, in parentheses, the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months]. This log is the total amount of VOCs and HAPs emitted to the air on a 12 month consecutive basis.

(End of Conditions)